



Arent Fox LLP / Attorneys at Law
Boston / Los Angeles / New York / San Francisco / Washington, DC

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Glenn Colton

Partner
212.484.3972 DIRECT
212.484.3990 FAX
glenn.colton@arentfox.com

VIA ECF

The Honorable Ann M. Donnelly
225 Cadman Plaza East
Courtroom 4GN
Brooklyn, New York 11201

Reference Number
040714.00002

Re: *United States v. Simonlacaj, et. al*, 19 cr. 00575 (AMD)

Dear Judge Donnelly,

We represent John Simonlacaj in the above-referenced case. As the Court is aware, Mr. Simonlacaj was sentenced to serve four months' incarceration. He is currently serving that sentence and is thus no longer on bail. We write to request the removal of the bail conditions imposed during his pretrial release including: 1) approving the return of Mr. Simonlacaj's passport and passport card to his wife Drita Simonlacaj; and 2) formally vacating the order dated December 27, 2019 [ECF No. 109] regarding restrictions on particular property imposed to secure Mr. Simonlacaj's release on bail.

We have communicated with the AUSAs assigned to the case who have informed us that the Government has no objection to these requests.

Respectfully submitted,

s/ Glenn Colton

Glenn Colton

cc: Keith Edelman, AUSA
Kayla Bensing, AUSA